

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

HARTFORD ACCIDENT AND INDEMNITY)
COMPANY, HARTFORD FIRE INSURANCE)
COMPANY, AND TWIN CITY FIRE)
INSURANCE COMPANY,)
Plaintiffs,)
v.) Case No. 3:14-cv-00559-JJH
Judge Jeffrey J. Helmick
FLEXIBLE FOAM PRODUCTS, INC.,)
OHIO DECORATIVE PRODUCTS, INC.,)
MOELLER CONSTRUCTION COMPANY,)
MOELLER LAND AND CATTLE COMPANY,)
GREAT AMERICAN ALLIANCE INSURANCE)
COMPANY, WESTCHESTER FIRE)
INSURANCE COMPANY, OHIO)
CASUALTY INSURANCE COMPANY,)
AND DOE COMPANIES)
1 THROUGH 5.)
Defendants.)

JOINT MOTION TO DISMISS ACTION WITHOUT PREJUDICE

Plaintiffs and defendants jointly move the Court to dismiss this action, including all claims, counterclaims and cross-claims which have been asserted, without prejudice, with each party to bear its own costs and fees.

Respectfully submitted,

s/Alan M. Posner by s/ Stuart Goldberg
with email permission 1/7/15

Alan M. Posner
Admitted Pro Hac Vice
Wayne S. Karbal
Admitted Pro Hac Vice
KARBAL, COHEN, ECONOMOU, SILK
& DUNNE
Ste. 1700
150 South Wacker Drive
Chicago, IL 60606
312-431-3632
Fax: 312-431-3670
Email: aposner@karballaw.com
Email: wkarbal@karballaw.com

Stuart J. Goldberg (0029469)
EASTMAN & SMITH
24th Floor
One SeaGate
P.O. Box 10032
Toledo, OH 43699
419-247-1623
Fax: 419-247-1777
Email: SJGoldberg@EastmanSmith.com

ATTORNEYS FOR PLAINTIFFS
HARTFORD ACCIDENT AND
INDEMNITY COMPANY, HARTFORD
FIRE INSURANCE COMPANY, AND
TWIN CITY FIRE INSURANCE
COMPANY

s/ Amy Ruth Ita by s/Stuart J. Goldberg
with e-mail permission

1/7/15
Amy Ruth Ita
(aita@btlaw.com)
BARNES & THORNBURG LLP
41 S. High Street, Suite 3300
Columbus, Ohio 43215
Telephone: (614) 628-1406
Facsimile: (614) 628-1433

Carrie Marie Raver (25257-49)
Admitted Pro Hac Vice
(carrie.raver@btlaw.com)
BARNES & THORNBURG LLP
600 One Summit Square
Fort Wayne, IN 46802
Telephone: (260) 425-4652
Facsimile: (260) 424-8316

Scott Godes
Admitted Pro Hac Vice
(scott.godes@btlaw.com)
BARNES & THORNBURG LLP
1717 Pennsylvania Avenue NW, Suite 500
Washington, D.C. 20006-4623
Telephone: (202) 408-6928
Facsimile: (202) 289-1330

ATTORNEYS FOR DEFENDANTS
OHIO DECORATIVE PRODUCTS, LLC,
FFP HOLDINGS LLC AND MOELLER
LAND & CATTLE COMPANY, INC.

s/Michael R. Orlando by s/Stuart J.
Goldberg with email permission 1/7/15

Michael R. Orlando
Admitted Pro Hac Vice
COHN, BAUGHMAN & MARTIN
Ste. 900
333 West Wacker Drive
Chicago, IL 60606
Tel: 312-753-6618
Fax: 312-753-6601
Email: michael.orlando@mclolaw.com

David R. Cooper (0065427)
MARSHALL & MELHORN, LLC
Four Seagate, Eighth Floor
Toledo, Ohio 43604-1599
Telephone: (419) 249-7100
Email: rcooper@marshall-melhorn.com
Direct Dial: (567) 316-6260 (ext. 6260)

ATTORNEYS FOR DEFENDANT
WESTCHESTER FIRE INSURANCE
COMPANY

s/Oliver J. Dunford by s/ Stuart J.
Goldberg with email permission 1/7/15

Oliver J. Dunford (0073933)
HAHN, LOESER & PARKS
2800 BP Tower
200 Public Square
Cleveland, OH 44114
216-274-2385
Fax: 216-274-2541
Email: odunford@hahnlaw.com

ATTORNEYS FOR DEFENDANT
GREAT AMERICAN ALLIANCE
INSURANCE COMPANY

s/ Gary W. Johnson by s/ Stuart J.
Goldberg with email permission 1/7/15
Gary W. Johnson (0017482)
WESTON HURD LLP
1301 East 9th Street, Suite 1900
Cleveland, OH 44114-1862
Tel.: 216-687-3295
Fax: 216-621-8369
Email: gjohnson@westonhurd.com

Of Counsel:
Michael J. Cohen
Meissner Tierney Fisher & Nichols
111 E. Kilbourn Avenue
19th Floor
Milwaukee, Wisconsin 53202
Tel.: 414-273-1300
Fax: 414-273-5840

ATTORNEYS FOR DEFENDANT OHIO
CASUALTY INSURANCE COMPANY